

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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JAMES THOMAS

Case No. 19-CV-1224-JPS

Plaintiff,

Personal Injury-Auto: 30101

and

MIDDLESEX INSURANCE COMPANY, and  
UNITEDHEALTHCARE INSURANCE COMPANY  
D/B/A AARP MEDICARE SUPPLEMENT PLANS AND/OR  
MEDICARE SOLUTIONS

Involuntary Plaintiffs,

vs.

BALDWIN & LYONS, INC., and  
BRINK'S, INC.

Defendants

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**PLAINTIFF'S ANSWER TO UNITED HEALTHCARE INSURANCE COMPANY'S  
CROSS CLAIM**

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NOW COMES, the above names plaintiff, through her attorneys, Martin Law Office, S.C. and answers United Healthcare Insurance Company's (hereinafter "UHC") cross-claim as follows:

1. In response to paragraph no. 1 of the Cross-Claim, re-alleges and re-incorporates the allegations of the Complaint herein.

2. In response to paragraph no. 2 of the Cross-Claim, the answering plaintiffs are without knowledge or information sufficient to form a belief as to the truth of the allegation and therefore denies the same and puts UHC to its strict proof thereon.

3. In response to paragraph no. 3 of the Cross-Claim, the answering plaintiffs are without knowledge or information sufficient to form a belief as to the truth of the allegation and therefore denies the same and puts UHC to its strict proof thereon.

4. In response to paragraph no. 4 of the Cross-Claim, the answering plaintiffs are without knowledge or information sufficient to form a belief as to the truth of the allegation and therefore denies the same and puts UHC to its strict proof thereon.

5. In response to paragraph no. 5 of the Cross-Claim, admit that UHC made payments on behalf of the plaintiff, James Thomas; as to the remaining allegations, the answering plaintiffs are without knowledge or information sufficient to form a belief as to the truth of the allegation and therefore denies the same and puts UHC to its strict proof thereon.

6. In response to paragraph no. 6 of the Cross-Claim, the answering plaintiffs are without knowledge or information sufficient to form a belief as to the truth of the allegation and therefore denies the same and puts UHC to its strict proof thereon.

Dated: December 12, 2019

**MARTIN LAW OFFICE, S.C.**  
Attorney for Plaintiff(s)

*Electronically Signed by Drew J. DeVinney*

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Drew J. De Vinney  
State Bar No. 01088576

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